

## **AMENDED Exhibit 267**

# **PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

## Message

From: [REDACTED]  
 Sent: 12/3/2021 6:15:50 PM  
 To: Miki Rothschild [REDACTED]; [REDACTED] Darius Kilstein [REDACTED]; [REDACTED]  
 [REDACTED]; [REDACTED]; IG\_Well-being\_Leads [REDACTED]  
 CC: IGWB Support Leads [REDACTED]; [REDACTED]  
 [REDACTED]; [REDACTED] Shruti Bhutada [REDACTED]; [REDACTED]  
 [REDACTED]; [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]; Liza Crenshaw  
 [REDACTED]; Vaishnavi J [REDACTED] Karina Newton [REDACTED]  
 Subject: Re: [Launch Decision; Input Needed by EOD] Take a Break

Hi Miki

We are aligned. Given proposal to expand the upsell to Reels next half and opt new teens in by default, we agree starting with the +20 min option makes sense before broadening reach (especially given comparable performance between the variants). The opposite feels more like a one-way door.

Thanks,

From: Miki Rothschild [REDACTED]  
 Sent: Friday, December 3, 2021 9:44 AM  
 To: [REDACTED] Darius Kilstein [REDACTED]  
 [REDACTED]; [REDACTED] IG\_Well-being\_Leads  
 [REDACTED]  
 Cc: IGWB Support Leads [REDACTED]; [REDACTED]  
 [REDACTED] Shruti Bhutada [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]; Liza Crenshaw  
 [REDACTED] Vaishnavi J [REDACTED] Karina Newton [REDACTED]  
 Subject: Re: [Launch Decision; Input Needed by EOD] Take a Break

RE #1, this aligns with my hunch. Basically, once we expand across surfaces the reach between 10 vs 20 minutes should be closer to +100% vs current +20% and right now we don't really understand the implications this would have.

Given the short time frame we have to decide, and again the upside in reach isn't large while the downside in option value is significant, I **recommend we go with 20 minutes for next week**. We can always shorten it in the future (while the opposite sequence seems more tricky to me).

Thanks,  
 Miki

From: [REDACTED]  
 Date: Friday, December 3, 2021 at 9:23 AM  
 To: Darius Kilstein [REDACTED], Miki Rothschild [REDACTED]



[REDACTED] IG\_Well-being\_Leads [REDACTED], [REDACTED]  
 Cc: IGWB Support Leads [REDACTED], [REDACTED], [REDACTED]  
 [REDACTED]  
 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
 [REDACTED] [REDACTED] [REDACTED]  
 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
 [REDACTED] Liza Crenshaw [REDACTED] Vaishnavi J [REDACTED] Karina  
 Newton [REDACTED]  
**Subject:** Re: [Launch Decision; Input Needed by EOD] Take a Break

Hi Miki and Darius,

Weighing in the questions:

**Miki; #1: One thing that was surprising to me is that the reach with 10 minutes threshold isn't that much higher than 20 minutes threshold. I assume that's because we are only targeting/counting on Explore feed right now, is that right?**

Agreed but with a clarification. In terms of required user behavior, there are two eligibility requirements: (1) +10 or +20 minutes of app session time anywhere on IG and (2) entering a handful of Explore chaining surfaces. I think #2 is driving the smaller than expected difference in reach between 10 vs 20 mins. Otherwise, for our target population and across all surfaces, we see ~43% of teens have at least one +10 min session vs ~20% of teens for +20 min sessions.

**Miki; #2/ If we are to project out into H1, I assume next half we'll have the session duration cover all of Instagram (Home Feed, Explore Feed, Reels etc), correct? Would this have risk of potentially changing the outcome of this decision between 10 and 20 minutes?**

Miki, Gargi will follow up here in the context of our prioritization principles and roadmapping decisions. However, changes in eligibility next half will primarily focus on surfaces where the upsell can be seen (i.e. the 2<sup>nd</sup> user behavior requirement from above).

**Darius: Also, how long did we run the experiment? I imagine the impact on key metrics accumulate over time as people take more and more breaks. Not a blocker given the timelines, but something to note – it'd be great to track over a longer period (either this test, or the one where we add more surfaces if that is happening).**

The experiment has been running since 11/2, so the analysis includes 27 days of data. During the experiment analysis, we evaluated the accumulative ecosystem effects (i.e. days since first exposure view) as well and found no consistent evidence of stat-sig regressions.

We strongly recommend retaining a holdout to continue tracking the impact of ecosystem metrics, with special attention to good user experiences, overall objectionable prevalence, and IG Revenue based on the call outs in the launch decision recommendation. We will follow up with the holdout % details as well as our POV on how we should tradeoff the value of the holdout vs risks highlighted in the well-being holdout rules.

Best,

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**From:** Darius Kilstein [REDACTED]  
**Date:** Thursday, December 2, 2021 at 11:30 PM  
**To:** Miki Rothschild [REDACTED], [REDACTED]  
 [REDACTED] [REDACTED] IG\_Well-being\_Leads [REDACTED]



Cc: IGWB Support Leads [REDACTED], [REDACTED], [REDACTED]

[REDACTED] Shruti Bhutada [REDACTED]

[REDACTED] Liza Crenshaw

[REDACTED] Vaishnavi J [REDACTED] Karina Newton [REDACTED]

**Subject:** Re: [Launch Decision; Input Needed by EOD] Take a Break

Don't have access to the deck but the results seem fine, no major concerns from my side.

Agree with Miki, it's hard to become eligible so what happens if we expand this to more surfaces. Starting with a more conservative approach makes sense. I think about 1.2% of sessions are 20min+ and 3.2% of sessions are 10-20min (95.6% less than 10), so the difference b/w 10 and 20 as choices is quite sizeable. If we roll it out to more surfaces and we still see minimal impact we should bring it down to 10min.

Also, how long did we run the experiment? I imagine the impact on key metrics accumulate over time as people take more and more breaks. Not a blocker given the timelines, but something to note – it'd be great to track over a longer period (either this test, or the one where we add more surfaces if that is happening).

Congrats

---

**From:** Miki Rothschild [REDACTED]

**Date:** Thursday, December 2, 2021 at 7:06 PM

**To:** [REDACTED], [REDACTED], [REDACTED], [REDACTED]

[REDACTED] Darius Kilstein

**Cc:** IGWB Support Leads [REDACTED], [REDACTED], [REDACTED]

[REDACTED] Shruti Bhutada [REDACTED]

[REDACTED] Liza Crenshaw

[REDACTED] Vaishnavi J [REDACTED] Karina Newton [REDACTED]

**Subject:** Re: [Launch Decision; Input Needed by EOD] Take a Break

Sorry, I meant "rather go with 20 minutes", assuming we believe there's a risk of surface expansion changing the outcome of the decision. I suppose we can offline analyze the distributions to inform if this is a risk though.

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**From:** [REDACTED]

**Date:** Thursday, December 2, 2021 at 7:01 PM

**To:** Miki Rothschild [REDACTED], [REDACTED], [REDACTED]

IG\_Well-being\_Leads <[REDACTED]>, [REDACTED] Darius Kilstein

**Cc:** IGWB Support Leads [REDACTED], [REDACTED]

[REDACTED] Shruti Bhutada [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED], Liza Crenshaw  
[REDACTED] Vaishnavi J [REDACTED], Karina Newton [REDACTED]  
**Subject:** Re: [Launch Decision; Input Needed by EOD] Take a Break

+ @Darius Kilstein to weigh in on ecosystem impact evaluation.

Thanks!!

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**From:** Miki Rothschild [REDACTED]  
**Sent:** Thursday, December 2, 2021 6:57:38 PM  
**To:** [REDACTED] IG\_Well-being\_Leads [REDACTED]; [REDACTED]  
**Cc:** IGWB Support Leads [REDACTED]; [REDACTED]  
[REDACTED] Shruti Bhutada [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Vaishnavi J [REDACTED]  
[REDACTED] Karina Newton [REDACTED] Liza Crenshaw [REDACTED]  
**Subject:** Re: [Launch Decision; Input Needed by EOD] Take a Break

+ @ [REDACTED]

<A/C Priv>

PRIV

-Miki

---

**From:** [REDACTED]  
**Date:** Thursday, December 2, 2021 at 6:18 PM  
**To:** [REDACTED] IG\_Well-being\_Leads <[REDACTED]>

>  
 Cc: IGWB Support Leads [REDACTED], [REDACTED], [REDACTED]  
 [REDACTED], [REDACTED] Shruti Bhutada [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED] Vaishnavi J [REDACTED]  
 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] Karina Newton  
 [REDACTED], [REDACTED], [REDACTED], Liza Crenshaw  
 [REDACTED]  
**Subject:** Re: [Launch Decision; Input Needed by EOD] Take a Break

This looks good to me.

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---

**From:** [REDACTED]  
**Sent:** Thursday, December 2, 2021 6:13:26 PM  
**To:** [REDACTED] IG\_Well-being\_Leads <[REDACTED]>  
**Cc:** IGWB Support Leads <igwb\_support\_leads@fb.com>; [REDACTED]  
 [REDACTED] Shruti Bhutada [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED] Vaishnavi J [REDACTED]  
 [REDACTED] [REDACTED] Karina Newton [REDACTED]; [REDACTED]  
 [REDACTED]; Liza Crenshaw [REDACTED]  
**Subject:** Re: [Launch Decision; Input Needed by EOD] Take a Break

Personally I'm very excited about this and I don't see any flags except the tight timeline to get everything lined up for Monday launch. Let's please flag any concerns promptly so that we can keep the launch on track.

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**From:** [REDACTED]  
**Date:** Thursday, December 2, 2021 at 10:56 AM  
**To:** IG\_Well-being\_Leads <[REDACTED]>  
**Cc:** IGWB Support Leads [REDACTED], [REDACTED]  
 [REDACTED], Shruti Bhutada [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED] Vaishnavi J [REDACTED]  
 [REDACTED] [REDACTED] [REDACTED] Karina Newton  
 [REDACTED], [REDACTED], Liza Crenshaw  
 [REDACTED]  
**Subject:** [Launch Decision; Input Needed by EOD] Take a Break

Hi Miki and WB Leads,

We wanted to share an update and get a launch decision for "Take a Break" based on experiment results. As a reminder, target launch is on Dec 6 (Monday), external announcements early on Dec 7 ahead of the upcoming



testimony on Dec 8. Please share your thoughts (concerns or support for launch) by EOD so we can iterate before sharing with Pavni for a final launch decision by tomorrow.

Deck with all the test result details is available [here](#).

**TL;DR: We recommend launching the 10 min variant given higher reach than 20 min variant and comparable adoption/dismissal rates**

- **Context:** We tested two variants of Take a Break - eligible teens saw the upsell either 10 or 20 mins into an app session ([mocks here](#))
- **Overall:** Results show the test was successful - adoption and dismissal rates met our thresholds; and there were no regressions in IG Critical Metrics.
- **Break usage:** There was meaningful usage of the break reminder in both variants, ~15% of users ended the session within 1 min of seeing the reminder and didn't start a new session for another +10 mins
- **Ecosystem Call Outs:** There are no stat-sig regressions in ecosystem metrics, and we have sufficient power to rule out material regressions in all IG Critical Metrics except *good user experiences* (performance metric) and *overall objectionable prevalence*. We recommend proceeding with the launch and monitoring these two metrics. We also recommend monitoring *IG Revenue*, which, worst case, could regress by about half of the material regression threshold (-0.09% vs the -0.20% budget).
- **Future Projection:** Based on the results, we predict that 1M teens will see the upsell (11.28% vs 8.70% of eligible teens in the 6 EN countries) and ~37k will adopt Take a Break in the first month if launched with the +10 min variant.

#### Results Summary:

##### Usage

| Funnel Step     | Defined As                                                                                                                           | 10 minute | 20 minute | Benchmark/Threshold |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|---------------------|
| Upsell click    | Of those who saw the upsell, # that clicked on "Turn On" CTA to see bottom sheet                                                     | 5.40%     | 5.80%     | n/a                 |
| Upsell adoption | Of those who saw the upsell, # that set up and kept the break                                                                        | 3.60%     | 3.90%     | >=0.5%              |
| Dismissal       | Of those who saw the upsell, # that clicked on "Not Now" and never set up a break                                                    | 6.80%     | 7.30%     | <=20%               |
| Taking a break  | Of those who go the reminder, # that ended the session within 1 min of seeing it and didn't start a new session for another +10 mins | 15.80%    | 14.60%    | n/a                 |

##### First Month Projections (based on test data)

| Step in Month 1              | # of Teens in 6 EN countries | % of prior | # of Teens in 6 EN countries | % of prior |
|------------------------------|------------------------------|------------|------------------------------|------------|
|                              |                              | 10 min     | 20 min                       |            |
| IG u18 MAU in 6 EN countries | 35M                          |            | 35M                          |            |



|                                             |       |       |       |      |
|---------------------------------------------|-------|-------|-------|------|
| Eligible for TaB upsell*                    | 9M    | 26%   | 9M    | 26%  |
| See TaB upsell**                            | 1M    | 11.3% | 790k  | 8.7% |
| Activate control                            | 36.8k | 3.6%  | 30.8k | 3.9% |
| See break experience >=1 time               | 18.8k | 51%   | 15.9k | 52%  |
| Use break experience to leave app >=1 time  | 10.2k | 54%   | 8.9k  | 56%  |
| Use break experience to leave app >=3 times | 3.3k  | 32%   | 2.7k  | 31%  |

\* Eligibility considerations: only stated age, adding English locale, iOS, and adding the app version constraint

\*\* Seeing upsell depends on hitting trigger criteria while scrolling down Explore "similar posts" view

### Ecosystem Impact

| +10 Minute Variant Ecosystem Impact |                                |                            |                            |                          |               |
|-------------------------------------|--------------------------------|----------------------------|----------------------------|--------------------------|---------------|
| Description                         | Materiality Threshold (Budget) | Topline Impact Lower Bound | Topline Impact Upper Bound | Topline Impact Stat-Sig? | Meets Budget? |
| Good User Experiences               | -0.20%                         | -0.29%                     | 0.07%                      | No                       | No            |
| Overall Objectionable Prevalence    | 1%                             | -1%                        | 1.17%                      | No                       | No            |
| Foreground Sessions                 | -0.20%                         | -0.14%                     | 0.06%                      | No                       | Yes           |
| Reels Intentional Plays             | -0.75%                         | -0.37%                     | 0.16%                      | No                       | Yes           |
| Stories Impressions                 | -0.30%                         | -0.09%                     | 0.27%                      | No                       | Yes           |
| Feed Impressions                    | -0.50%                         | -0.18%                     | 0.04%                      | No                       | Yes           |
| Direct Sends                        | -1%                            | -0.23%                     | 0.32%                      | No                       | Yes           |
| IG Time Spent                       | -0.20%                         | -0.15%                     | 0.14%                      | No                       | Yes           |
| Infra - Power                       | 0.40%                          | -0.13%                     | 0.04%                      | No                       | Yes           |
| Infra - TAO                         | 0.40%                          | -0.14%                     | 0.04%                      | No                       | Yes           |
| IG DAP                              | -0.20%                         | -0.01%                     | 0.01%                      | No                       | Yes           |
| Original Stories Creation           | -0.50%                         | -0.15%                     | 0.15%                      | No                       | Yes           |
| Reels Producer DAP                  | -2%                            | -1.96%                     | 1.37%                      | No                       | Yes           |
| Creator Watch Time                  | -0.50%                         | -0.24%                     | 0.11%                      | No                       | Yes           |
| IG Revenue                          | -0.20%                         | -0.09%                     | 0.26%                      | No                       | Yes           |
| IG DAU                              | n/a                            | -0.05%                     | 0.02%                      | No                       | Yes           |

| +20 Minute Variant Ecosystem Impact |                                |                            |                            |                          |               |
|-------------------------------------|--------------------------------|----------------------------|----------------------------|--------------------------|---------------|
| Description                         | Materiality Threshold (Budget) | Topline Impact Lower Bound | Topline Impact Upper Bound | Topline Impact Stat-Sig? | Meets Budget? |
| Good User Experiences               | -0.20%                         | -0.22%                     | 0.06%                      | No                       | No            |



|                   |        |        |       |    |     |
|-------------------|--------|--------|-------|----|-----|
| Overall           |        |        |       |    |     |
| Objectionable     |        |        |       |    |     |
| Prevalence        | 1%     | -0.77% | 0.90% | No | Yes |
| Foreground        |        |        |       |    |     |
| Sessions          | -0.20% | -0.11% | 0.05% | No | Yes |
| Reels Intentional |        |        |       |    |     |
| Plays             | -0.75% | -0.28% | 0.12% | No | Yes |
| Stories           |        |        |       |    |     |
| Impressions       | -0.30% | -0.07% | 0.21% | No | Yes |
| Feed Impressions  | -0.50% | -0.14% | 0.03% | No | Yes |
| Direct Sends      | -1%    | -0.18% | 0.25% | No | Yes |
| IG Time Spent     | -0.20% | -0.12% | 0.10% | No | Yes |
| Infra - Power     | 0.40%  | -0.10% | 0.03% | No | Yes |
| Infra - TAO       | 0.40%  | -0.11% | 0.03% | No | Yes |
| IG DAP            | -0.20% | -0.04% | 0.01% | No | Yes |
| Original Stories  |        |        |       |    |     |
| Creation          | -0.50% | -0.11% | 0.11% | No | Yes |
| Reels Producer    |        |        |       |    |     |
| DAP               | -2%    | -1.51% | 1.06% | No | Yes |
| Creator Watch     |        |        |       |    |     |
| Time              | -0.50% | -0.18% | 0.09% | No | Yes |
| IG Revenue        | -0.20% | -0.07% | 0.20% | No | Yes |
| IG DAU            | n/a    | -0.04% | 0.01% | No | Yes |

Based on these results, we feel comfortable launching Take a Break (on 12/6). Please let us know your thoughts.

Thanks,  
MWB team